

FEDER, KASZOVITZ, ISAACSON, WEBER,
SKALA, BASS & RHINE LLP
Murray L. Skala (MS 9354)
Jonathan D. Honig (JH 7577)
750 Lexington Avenue
New York, New York 10022
Phone: (212) 888-8200
Fax: (212) 888-5968

SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
Jonathan J. Lerner (JL 7117)
Michael H. Gruenglas (MG 8705)
Maura B. Grinalds (MG 2836)
Marco G. Argentieri (MA 8932)
Four Times Square
New York, New York 10036
Phone: (212) 735-3000
Fax: (212) 735-2000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
WORLD WRESTLING ENTERTAINMENT, INC. :
Plaintiff, : 04 CV 8223 (KMK)
: (ECF CASE)
v. :
JAKKS PACIFIC, INC.; JAKKS PACIFIC (H.K.) :
LIMITED; ROAD CHAMPS LIMITED; THQ, :
INC.; THQ/JAKKS PACIFIC LLC, THE JOINT :
VENTURE OF THQ, INC. and JAKKS PACIFIC, :
INC.; STANLEY SHENKER AND ASSOCIATES, :
INC.; STANLEY SHENKER; BELL LICENSING, :
LLC; JAMES BELL; JACK FRIEDMAN; :
STEPHEN BERMAN and JOEL BENNETT, :
Defendants. :
----- x

NOTICE OF MOTION TO DISMISS THE COMPLAINT

February 16, 2005

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Michael H. Gruenglas, Esq., and the JAKKS Defendants' Memorandum of Law in Support of their

Motion to Dismiss the Complaint submitted herewith, and upon all prior pleadings and proceedings had herein, the JAKKS Defendants will, by and through their attorneys, move this Court before the Honorable Kenneth M. Karas at the United States Courthouse, 500 Pearl Street, New York, New York, at 12:00 p.m. on April 14, 2005, or as soon thereafter as counsel may be heard, for an order dismissing plaintiffs' complaint with prejudice, or, in the alternative, to transfer this action pursuant to 28 U.S.C. § 1404(a) and for such other and further relief as the Court deems just and proper.

Dated: February 16, 2005

Respectfully submitted,

FEDER, KASZOVITZ, ISAACSON,
WEBER, SKALA, BASS & RHINE LLP
Murray L. Skala (MS 9354)
Jonathan D. Honig (JH 7577)
750 Lexington Avenue
New York, New York 10022
(212) 888-8200

SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP

By:

Jonathan J. Lerner (JL 7117)
Michael H. Gruenglas (MG 8705)
Maura B. Grinalds (MG 2836)
Marco G. Argentieri (MA 8932)
Four Times Square
New York, New York 10036
(212) 735-3000

Attorneys for the JAKKS Defendants